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Clerk, U.S. District Court
Fairbanks, AK

Kurt Kanam
2103 Harrison #143
Olympia WA 98502

UNITED STATES DISTRICT COURT
AT FAIRBANKS ALASKA

120 cv 02322

Kurt Kanam,

COMPLAINT FOR
DECLARATORY AND

INJUNCTIVE RELIEF

v.

4:21-cv-00016-TMB

Carrie Mills

The Office of Veronica Larvie

Doyon

Hungwitchin

Introduction

1. This is an action to declare that in a Private mining contest AAFF 096515 The Interior Board of Land Appeals, The Office of Veronica Larvie has failed notify Doyon and Hungwitchin of a private mining contest affect Doyon's and Hungwitchin's patented mining claims per 43 CFR § 2650.3-2 B (3)

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over this action and personal jurisdiction over the parties pursuant to 5 U.S.C.. This Court also has jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 5 U.S.C. §§ 701–706.

3. Venue is proper in this district under 5 U.S.C. because Defendant's principal place of business is in Washington DC.

Parties

4. Plaintiff Kurt Kanam is a mining claim holder.

5. Carrie Mills is a private mining contestant who has knowledge that Doyon and Hungwitchin Corporation are required to receive notice of Mr Mills private mining contest.

6. The office of Veronica Larvie graduated from law school and therefor is fully aware Doyon and Hungwitchin are required to receive notice of Mr Mills private mining contest per 43 CFR § 2650.3-2 B (3)

7. Doyon is the land owner and patent holder of the mining claim affected by Private mining contest AAFF 096515

8. Hungwitchin is the land owner and patent holder of the mining claim affected by Private mining contest AAFF 096515

Allegations

8. The Office of Veronica Larvie has knowledge that Doyon and Hungwitchin are indispensable parties to Private mining contest AAFF 096515 per 43 CFR § 2650.3-2 B (3)

9 Carie Mills has knowledge that Doyon and Hungwitchin Corporation are indispensable parties to Private mining contest AAFF 096515 per 43 CFR § 2650.3-2 B (3)

Causes of Action

11. The Administrative Procedure Act and the Declaratory Judgments Act

Requested Relief

WHEREFORE, Plaintiff prays that this Court:

1. Order that Private mining contest AAFF 096515 Hungwitchin are indispensable parties to Private mining contest AAFF 096515 per 43 CFR § 2650.3-2 B (3)

2. The Private mining contest AAFF 096515 must be dismissed per 43 CFR § 2650.3-2 B (3)

Date 6/9/21 Kurt Kanam 



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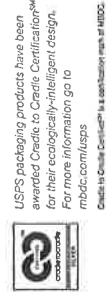
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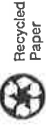
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